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April 24, 2015

**VIA ECF AND FIRST CLASS MAIL**

Hon. William H. Pauley III  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street, room 1920  
New York, NY 10007

**Re: Multimedia Plus, Inc. v. PlayerLync LLC, 14-cv-8216 (WHP)**

Dear Judge Pauley:

We have recently been retained by the Defendant PlayerLync LLC ("PlayerLync") as local counsel in the above-referenced action. We write in accordance with Rules 1A and 1D of Your Honor's Individual Practices and the Order of November 4, 2014 to respectfully request that PlayerLync's lead counsel, Ryan Tyz of TyzLaw Litigation & Counseling, be permitted to attend the Initial Pretrial Conference scheduled for May 8, 2015 telephonically.

Mr. Tyz is a member of the bar of the State of California and is based in San Francisco. We intend to submit a motion for his admission to appear Pro Hac Vice in advance of the scheduled conference, to the extent he receives a certificate of good standing from the California state bar, which he has already requested. Alternatively, to the extent he does not receive his certificate of good standing in advance of the conference, he plans to move for admission to appear Pro Hac Vice orally at the beginning of the scheduled conference and will submit his certificate of good standing as soon as he receives it.

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We thank the Court for its time and consideration of this matter.

Sincerely,

A handwritten signature in dark ink, appearing to be 'R. Trotter', with a long horizontal flourish extending to the right.

Richard W. Trotter

cc by email: Ryan Tyz, Esq. ([ryan@tyzlaw.com](mailto:ryan@tyzlaw.com)); Barry Negrin  
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